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Date:

3/17/2006 10:23:51 AM

Subject:

Docket 06-BAP-1, Draft Bioenergy Action Plan

To Whom It May Concern,

RCI strongly urges the Bioenergy Interagency Working Group to amend its Draft Bioenergy Action Plan to not recommend mixed municipal solid waste (MSW) thermal disposal technologies (including gasification, pyrolysis and plasma) as fuel or power sources.

Thermal technologies that combust gases are considered incineration by the European Union Directive on Waste. Emissions from incineration (including gasification, pyrolysis and plasma) of mixed municipal wastes contain hazardous chemicals such as heavy metals, dioxins, brominated dioxins, volatile organic compounds, and other chemicals. Mixed municipal wastes also contain many products from non-renewable sources, such as plastics. Please don't make it easier to build new incinerators in California by advocating for state handouts, waste diversion credits, loosened regulations, or other incentives.

In other words, heterogenous waste mixtures like MSW are inherently prone to create toxic byproducts. If used at all, these incineration systems should only be applied to more homogenous and less chemically complex waste streams, such as biomass from agriculture.

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